

### REMARKS

Claims 8-19 are pending in this application. Claims 1-7 have been cancelled. Claims 8-19 overcome the rejections under 35 USC 112 and 35 USC 101. Accordingly, Applicants respectfully requests removal of the rejections under 35 USC 112 and 35 USC 101. In the specification, it is respectfully submitted that 37 CFR 177(b) is a guideline and not meant to be binding. The Applicants have filed numerous Applications with the Office where the section headings were bold faced and underlined and not objected to. However, if the Examiner maintains the objection to the specification, the Applicants will modify the section headings as suggested to further prosecution pending the outcome of the review of the amendments contained herein.

### Rejections under 35 USC 102

Claims 8-19, as presented, are not anticipated by US Patent 6,138,123 issued to Rathbun. Rathbun creates parallel data structures that are identical in form and function to the sequential data structures in a parallel environment. The same list of values are maintained for each parallel data structure (see column 16, lines 1-4). Thus, Rathbun does not teach the features of defining a node group having a plurality of nodes to represent a root node; storing values associated with each of the plurality of nodes contiguously in memory; or sharing a single pointer referencing a lower level of node groups, each of the lower level node groups being stored contiguously, as specified in independent claims 8 and 14. Applicants would also like to point out that claims 9 and 15 specify that the values for the respective node groups are different.

Applicants respectfully request a Notice of Allowance based on the foregoing remarks. If the Examiner has any questions concerning the present amendment, the Examiner is kindly requested to contact the undersigned at (408) 774-6921. If any other fees are due in

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connection with filing this amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. ALTEP073). A copy of the transmittal is enclosed for this purpose.

Respectfully submitted,  
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